

REMARKS

Applicants request favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 4-6 and 14-17 are pending in this application, with Claims 4, 14 and 17 being independent.

Claims 4, 14, and 17 have been amended. Applicants submit that support for the amendments can be found in the original disclosure at least, for example, at page 6, lines 23-25; page 7, lines 18-21; and page 15, lines 12-13. Therefore, no new matter has been added.

Claim 17 was rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants have amended that claim to recite a program embodied in a computer-readable medium. Accordingly, Applicants submit that the Examiner's object has been addressed and request withdrawal of this rejection.

Claims 4, 14, and 17 were rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. The Examiner asserted that it is unclear whether the "key" recited in the decrypting is another random number or the claimed common key. Applicants respectfully submit that the claimed key is broad enough to encompass either the use of the common key for decryption or the use of another key, and that the claim is not indefinite merely because a broad term is used. Moreover, Applicants submit that the original specification supports this construction at least, for example, at page 15, lines 19-22. In particular, the specification discloses that an encryption table may be generated by converting a random number using the common key and that the encryption table may be the common table, and it also discloses that the common key can be used as a parameter in

the congruential method, and an encryption table may be generated using pseudo-random numbers. Thus, Applicants submit that the recited key used for decryption may be the common key but is not limited to being the common key *per se*.

Claims 4-6 and 14-17 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,711,677 (Wiegley). Applicants respectfully traverse this rejection.

The present invention recited in independent Claim 4 is directed to an image data recording device that includes, *inter alia*, the features of generating a common key based on a print ID transferred from an image data processing device, managing the generated common key and the print ID transferred from the image data processing device in pairs, and obtaining the common key corresponding to the print ID from management means when the print ID and print control data are transmitted from the image data processing device. Because the common key and print ID are managed by a printer in pairs, even if the recording device is connected to a plurality of host computer a print process can be performed according to the transfer order of print control data regardless of the order of common key issuance (i.e., the common key paired with a print ID can be reliably obtained from management means regardless of the order the print ID is received). Applicants submit that the cited art fails to disclose or suggest at least these features of independent Claim 4.

The Examiner suggests in his Response to Arguments that the “session identifier” of Wiegley corresponds to the claimed common key and that a “secure session print request” inherently has its own ID. However, even assuming for the sake of argument that this is true, Applicants submit that Wiegley fails to disclose or suggest managing a generated common key and a transferred print ID in pairs. Specifically, table 40 in Fig. 8

of that patent shows a plurality of session identifiers, but the patent is silent as to any management of those session identifiers in pairs with print Ids.

Further, Applicants submit that Wiegley fails to disclose or suggest obtaining a common key corresponding to a print ID from management means when the print ID and print control data are transmitted from the image data processing device. In particular, Applicants submit that Wiegley discloses that the session identifier is transmitted from the computer 12 and received by the printer 10. Although the session identifier may be checked to see if it has been changed and/or whether it is stored in table 40, since the session identifier is received from the computer Applicants submit that there is no need in that patent to perform the claimed obtaining function.

For the foregoing reasons, Applicants submit that the present invention recited in independent Claim 4 is patentable over the cited art. Independent Claims 14 and 17 recite similar features and are believed patentable for similar reasons.

The dependent claims are allowable for the reasons given for the independent claims and because they recite additional features that are patentable in their own right. Individual consideration of the dependent claims is respectfully solicited.

In view of the above amendments and remarks, the claims are now in allowable form. Therefore, early passage to issue is respectfully solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. L. Klock", written over a horizontal line.

Attorney for Applicants

Brian L. Klock

Registration No.36,570

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
BLK/mls

DC_MAIN 212465v1